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March 21, 2007

Honorable James H. Welsh
Commissioner of Conservation
Office of Conservation
P. O. Box 94275
Baton Rouge, LA 70804-4275

Re: Mulvey-Alliance Zone, Reservoir A
Camerina Zone, Reservoirs A and B
Miogypsinoides Zone, Reservoir A
FLORENCE FIELD, Vermilion Parish, Louisiana
Creation of Units

Dear Commissioner Welsh:

Application is hereby made on behalf of **CIMAREX ENERGY COMPANY** for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of orders pertaining to the following matters relating to the Mulvey-Alliance Zone, Reservoir A, the Camerina Zone, Reservoirs A and B, and the Miogypsinoides Zone, Reservoir A, all in the Florence Field, Vermilion Parish, Louisiana:

Mulvey-Alliance Zone, Reservoir A

1. To establish rules and regulations and to create a single drilling and production unit for the exploration for and production of gas and condensate from the Mulvey-Alliance Zone, Reservoir A, in the Florence Field, Vermilion Parish, Louisiana, said proposed unit designated MULVEY-ALLIANCE RA SUA, as shown on the plat attached hereto and made a part hereof.
2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the proposed unit with each tract sharing in unit production on a surface acreage basis of participation.
3. To provide that any wells drilled to the Mulvey-Alliance Zone, Reservoir A, within or outside of the unit created herein, should be located in accordance with the spacing provisions of LAC 43:XIX.1901 et seq. (Statewide Order No. 29-E).
4. To provide that the Commissioner of Conservation should be authorized to reclassify the reservoir by supplemental order without the necessity of a public hearing if the producing characteristics of the reservoir change and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation.
5. To consider such others matters as may be pertinent.

The Mulvey-Alliance Zone, Reservoir A, in the Florence Field, is hereby defined as being the stratigraphic equivalent of that gas and condensate bearing zone encountered between the depths of 12,357 feet and 13,390 feet (electrical log measurements) in Tiger Oil Co.– Gilmore No. 1 Well, located in Section 7, Township 13 South, Range 1 West, Vermilion Parish, Louisiana.

Camerina Zone, Reservoirs A and B

1. To establish rules and regulations and to create two drilling and production units for the exploration for and production of gas and condensate from the Camerina Zone, Reservoirs A and B, in the Florence Field, Vermilion Parish, Louisiana, said proposed units designated CAM RA SUA and CAM RB SUA, all as shown on the plat attached hereto and made a part hereof.

2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within each of the proposed units with each tract sharing in unit production on a surface acreage basis of participation.

3. To provide that any wells drilled to the Camerina Zone, Reservoirs A and B, within or outside each of the units created herein, should be located in accordance with the spacing provisions of LAC 43:XIX.1901 et seq. (Statewide Order No. 29-E).

4. To provide that the Commissioner of Conservation should be authorized to reclassify the reservoirs by supplemental order without the necessity of a public hearing if the producing characteristics of the reservoirs change and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation.

5. To consider such others matters as may be pertinent.

The Camerina Zone, in the Florence Field, is hereby defined as being the stratigraphic equivalent of that gas and condensate bearing zone, the top of which is located at 16,953 feet (electrical log measurement) in the Davis Petroleum Corp. – Fred M. Gilmore No. 1 Well, located in Section 5, Township 13 South, Range 1 West, and the base of which is located at 17,245 feet (electrical log measurement) in the Davis Petroleum Corp. – Fred M. Gilmore No. 2 Well, located in Section 7, Township 13 South, Range 1 West, Vermilion Parish, Louisiana.

Miogypsinoides Zone, Reservoir A

1. To establish rules and regulations and to create two (2) drilling and production units for the exploration for and production of gas and condensate from the Miogypsinoides Zone, Reservoir A, in the Florence Field, Vermilion Parish, Louisiana, said proposed units designated MIOGYR RA SUA and MIOGYR RA SUB, all as shown on the plat attached hereto and made a part hereof.

2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within each of the proposed units with each tract sharing in unit production on a surface acreage basis of participation.

3. To provide that any wells drilled to the Miogypsinoides Zone, Reservoir A, within or outside each of the units created herein, should be located in accordance with the spacing provisions of LAC 43:XIX.1901 et seq. (Statewide Order No. 29-E).

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4. To provide that the Commissioner of Conservation should be authorized to reclassify the reservoir by supplemental order without the necessity of a public hearing if the producing characteristics of the reservoir changes and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation.

5. To consider such others matters as may be pertinent.

The Miogypsinoides Zone, Reservoir A, in the Florence Field, is hereby defined as being the stratigraphic equivalent of that gas and condensate bearing zone encountered between the depths of 18,090 feet and 18,810 feet (electrical log measurements) in Davis Petroleum Corporation – Fred M. Gilmore No. 2 Well, located in Section 7, Township 13 South, Range 1 West, Vermilion Parish, Louisiana.

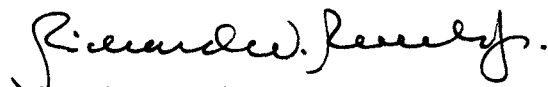
Pertinent data, including well logs, may be obtained **AT THE COST OF THE REQUESTING PARTY** from Louis Gilbert & Associates, 3636 North Causeway Blvd., Suite 204, Metairie, LA 70002, Telephone Number (504) 834-8112.

Pursuant to the Revised Rules of Procedure, a pre-application conference was held on January 10, 2007, in Lafayette, Louisiana, at which the parties named on the attached list were in attendance. The conference was opened by representatives of the applicant who explained the bases for the units being requested. Several questions were asked and answered. No opposition to the proposed Mulvey-Alliance Zone unit was expressed. That unit has been enlarged since the conference to reflect the applicant's revised geophysical interpretation. Two landowner representatives did present counterplans relating to the other two intervals. Differences could not be resolved and the conference was adjourned. Since that time, the applicant has revised its proposed Camerina and Miogypsinoides units in a manner it believes is acceptable to all parties. Should any party wish to consult in this matter regarding the revisions to these units, please call the undersigned and a pre-hearing conference will be scheduled.

Attached hereto and made a part hereof are revised plats outlining the applicant's proposals, the conference attendance list and the list of the names and addresses of the Interested Owners, Represented Parties, and Interested Parties to whom a copy of this application is being mailed. Pursuant to the Revised Rules of Procedure, the list of parties is being furnished ONLY to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation; however, the list of parties will be furnished to any party requesting a copy. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, enclosed is our check in the amount of \$2,265.00 made payable to the Office of Conservation submitted on behalf of the applicant representing the hearing application fee.

Very truly yours,


Richard W. Revels, Jr.

RWRjr/df
Attachments
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14155.0066

cc: Mr. Richard Hudson, Lafayette District Office of Conservation
cc: Interested Owners, Represented Parties, and Interested Parties

